

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FITZGERALD & CROUCH, P.C.

649 Newark Avenue

Jersey City, NJ 07306

By: Sarah J. Crouch, Esq. (SC 1174)

Phone: 201-533-1100

Fax: 201-533-1111

Attorney for the Debtor

In Re:

FREDDIE BLANQUERA

MARIA CARMEN BLANQUERA

Case No.: 17-18502

Judge: Papalia

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by Toyota Motor Credit, creditor,

A hearing has been scheduled for March 1, 2018, at 11:00 AM.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes

repayment as follows (explain your answer):

The Debtor will pay the \$1,065.00 no later than February 5, 2018. The Debtor requests the remaining arrears be rolled into the next six months of payments.

☐ Other (explain your answer):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.

4. I certify under penalty of perjury that the above is true.

Date: 1.30.2018

Date: 1.30.2018


Debtor's Signature


Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.